

1 RANDY S. GROSSMAN
Acting United States Attorney
2 DANIEL E. ZIPP
Assistant U.S. Attorney
California Bar No. 262118
3 Office of the U.S. Attorney
880 Front Street, Room 6293
4 San Diego, CA 92101
Tel: (619) 546-8463
5 Email: Daniel.Zipp@usdoj.gov
6 Attorneys for the United States
7

8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 UNITED STATES OF AMERICA,

11 v.

12 JUAN MANUEL ALVAREZ
13 INZUNZA (1)

14 Defendant.
15

Case No. 14-CR-2253-DMS

**UNITED STATES' RESPONSE TO
DEFENDANT'S MOTION FOR
DISCOVERY; AND UNITED STATES'
MOTION FOR RECIPROCAL
DISCOVERY**

Date: August 13, 2021
16

17 **BACKGROUND**

18
19 The indictment in this case came at the conclusion of a multi-year investigation
20 into the money laundering and drug trafficking activities of a group of individuals
21 associated with the Sinaloa Cartel. From 2013 through 2014, the Court signed a total of
22 eight Title III orders, authorizing the interception of electronic communication over 24
23 individual cellular devices. As a result of these interceptions, the United States seized
24 nearly \$4,000,000 in bulk currency drug proceeds, along with significant quantities of
25 cocaine, heroin, and methamphetamine. Defendant Alvarez Inzunza is the lead
26 defendant in the investigation. He was arrested in Mexico in March 2016 and extradited
27 to the United States on June 2, 2021.
28

DISCUSSION

Defendant requests production of all materials to which he is entitled under Federal Rule of Criminal Procedure 16, *Brady v. Maryland*, and Federal Rule of Evidence 404. On June 28, 2021, the Court signed a protective order for discovery, pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure. The following week, the United States turned over a large amount of criminal discovery including investigative reports, intercepted electronic communications and corresponding line-sheets, written and recorded statements by defendants, materials obtained by search warrant, financial records obtained by grand jury subpoena, rap sheets, and photographs. Given the volume of this material, the United States produced this discovery using an online portal. The United States has and will continue to comply with its discovery obligations. To the extent Defendant requests specific documents or types of documents, the United States will continue to disclose any and all discovery required by the relevant discovery rules.

MOTION FOR RECIPROCAL DISCOVERY

The United States hereby requests defendants to deliver all materials to which the Government may be entitled under Federal Rules of Criminal Procedure 16(b) and 26.2.

DATED: August 4, 2021

Respectfully submitted,

RANDY S. GROSSMAN
Acting United States Attorney

By: /s Daniel E. Zipp
DANIEL E. ZIPP
Assistant U.S. Attorney